

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. S1-4:09CR00679 002 HEA
	)	
ELAIN KAY YOUNG,	)	
	)	
Defendant.	)	

**DEFENDANT YOUNG'S OBJECTIONS  
TO PRESENTENCE REPORT**

COMES NOW defendant, Elain Kay Young, by and through counsel, Jennifer Herndon and Michael J. Gorla, and for her objections to the Presentence Report, states as follows:

1. On March 19, 2012, defendant was found guilty by a jury of the following offenses:  
Count One: conspiracy to commit murder for hire in violation of 18 U.S.C. § 1958; and Count Two:  
murder for hire in violation of 18 U.S.C. § 1958.

2. Defendant is scheduled to be sentenced by this Court on Monday, June 18, 2012, at 11:00 a.m.

3. Defendant disputes certain facts and sentencing factors included in the Presentence Report, and defense counsel has discussed these matters with Ms. Allison K. Redfern, the Senior United States Probation Officer who authored the Presentence Report.

4. While some matters were resolved by the parties, the following disagreements remain unresolved:

(a) **The Offense Conduct:** Defendant maintains that the government has not met its burden of proving her guilt of the offenses charged in Counts One and Two of the superseding

indictment beyond a reasonable doubt. Accordingly, she persists in her pleas of not guilty, and objects to any and all facts contained in the description of the offense conduct as outlined in ¶¶ 5-23 of the PSR that indicate that defendant committed said offenses.

Respectfully submitted,

/s/ Jennifer Herndon

JENNIFER HERNDON, #37921MO  
224 N. Highway 67, #122  
Florissant, Missouri 63031  
(314) 831-5531  
(314) 831-5645 - Facsimile

/s/ Michael J. Gorla

MICHAEL J. GORLA, #26399MO  
555 Washington Avenue, Suite 600  
St. Louis, Missouri 63101  
(314) 621-1617  
(314) 621-7448 - Facsimile

Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on June 8, 2012, the foregoing was filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following: Mr. Michael A. Reilly, Mr. Patrick T. Judge, and Mr. Thomas E. Dittmeier, Assistant United States Attorneys, 111 South 10<sup>th</sup> Street, 20<sup>th</sup> Floor, St. Louis, Missouri 63102, and Ms. Allison K. Redfern, Senior U.S. Probation Officer, 111 South 10<sup>th</sup> Street, Suite 2.325, St. Louis, Missouri 63102.

/s/ Michael J. Gorla